

1
2
3
4
5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 ERIC STEPHEN FREEZE

9 Case No. 2:23-cv-01135-RSM

10 Plaintiff,

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
NOTICE OF APPEARANCE

ELIZABETH GALLAGHER,
ANN G. FREEZE REVOCABLE TRUST,
RONALD L. FREEZE REVOCABLE
TRUST, JAMES MASSINGALE and
ANGELA MASSINGALE

ELIZABETH E. GALLAGHER, JOSE T.
ACUNA, ANN G. FREEZE REVOCABLE
TRUST, RONALD L. FREEZE
REVOCABLE TRUST, and JAMES
MASSINGALE and ANGELA
MASSINGALE

Defendants.

TO: CLERK OF THE COURT

AND TO: Plaintiff Eric Stephen Freeze

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that Defendants:

ELIZABETH E. GALLEGHER
ANN G. FREEZE REVOCABLE TRUST
RONALD FREEZE REVOCABLE TRUST
JAMES MASSINGALE and ANGELA MASSINGALE

1 Law Office of Paul W. Taylor, Inc., P.S.

20388 Eric Street

Mount Vernon, WA 98274

Phone: (360) 416-6900

pwtlaw@frontier.com

1 hereby file this Notice of Appearance in the above-entitled action, without waiving any
2 defense or defect including but not limited to lack of jurisdiction over subject matter, lack
3 of jurisdiction over person, lack of standing, improper venue, insufficiency of process
4 and/or service, failure to state a claim upon which relief may be granted and any other
5 deficiency under FRCP 12.

6 YOU ARE HEREBY FURTHER NOTIFIED it is respectfully requested that all future
7 papers and pleadings herein or notices of any nature or kind whatsoever affecting the rights
8 of said party except original process, be served upon the undersigned attorney at the
9 physical address stated below.

10
11 Dated this 17th day of November, 2023.

12 LAW OFFICE OF PAUL W. TAYLOR INC., P.S.
13

14 
15 PAUL W. TAYLOR, WSBA No. 13945
16 20388 Eric Street
17 Mount Vernon, WA 98274
18 360-416-6900
19 pwtlaw@frontier.com
20
21
22
23
24
25